EXHIBIT B

ANDERSON KILL P.C.

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By Hand Delivery

December 28, 2020

Clerk of the Court, Ruby J. Krajick United States District Court Southern District of New York Office of the Clerk 500 Pearl Street New York, New York 10007

Re: Jeanmarie Hargrave et al. v. Islamic Republic of Iran,

Case No.: 1:20-cv-9387; RE: Service

Dear Clerk of the Court, Ruby J. Krajick:

I represent the Plaintiffs in the above-referenced action.

I am writing to request you effect service on the Defendant, Islamic Republic of Iran, pursuant to 28 U.S.C. §1608(a)(4), at the following address:

Minister of Foreign Affairs
Ministry of Foreign Affairs of the Islamic Republic of Iran
Iman Khomeini Avenue
Tehran, Iran

ATTN: H.E. Mohammad Javad Zarif

Service on Iran cannot be effected under 28 U.S.C. Sections 1608(a)(1) and (2) because the United States and Iran do not have any special arrangement for service of process upon Iran in accordance with sub-section (1), nor is service permitted by any applicable international convention under the provisions of sub-section (2). See *Valore v. Islamic Republic of Iran*, 700 F. Supp. 2d 52, 70 (D.D.C. 2010).

On November 24, 2020, Plaintiffs, through the Clerk of the Court, attempted to serve the Defendant pursuant to the provision to 28 U.S.C. §1608(a)(3). Annexed hereto as **Exhibit 1.** is a copy of the certificate of mailing.

New York, NY ■ Los Angeles, CA ■ Stamford, CT ■ Washington, DC ■ Newark, NJ ■ Philadelphia, PA

¹ Iran is not a signatory to the convention of the Service Abroad of Judicial and Extrajudicial Documents in Civil or Commercial Matters.

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As of Monday, December 28, 2020, thirty (30) days have passed since the certificate of mailing has been issued and service had not been able to be completed under 28 U.S.C. § 1608(a)(3). Annexed hereto as **Exhibit 2**, is a true and correct copy of the USPS tracking information of the package sent by the Clerk of the Court indicating that serve has not been made.

Accordingly please serve the Defendant pursuant to 28 U.S.C. §1608(a)(4) at the following address:

Attn: Secretary of State, Director of Consular Services, Office of Policy Review and Inter-Agency Liaison (CA/OCS/PRI)
U.S. Department of State
SA-29, 4th Floor
2201 C Street NW
Washington, DC 20520

Enclosed please find copies of the following documents:

- 1. Civil Cover Sheet.
- 2. Complaint deemed filed on November 10, 2020.
- 3. Summons.
- 4. Statement of Relatedness.
- 5. Notice of suit prepared in accordance with 22 CF § 93.2 with a copy of 28 U.S.C. 1330, 1391(f), 1441(d) and 1602-1611.
- 6. Affidavit of translator.
- 7. Translations of the above mentioned documents.²

In total, we are providing three complete sets of the documents, in both English and Farsi. In accordance with pages 12-13 of the Court's Foreign Mailing Instructions, we are providing two sets for service on the Defendant and one set of documents for the Court's file.

We have also enclosed pre-paid FedEx label and envelope for delivery to the address above. Please note that our firm FedEx account number is 628354049.

We further enclose a cashier's check in the amount of \$2,275.00 made payable to "U.S. Embassy Bern."

Should you have any questions or require any additional information please do not hesitate to contact me.

² The affidavit of the translator comports with the requirements of NY CPLR 2101(b).

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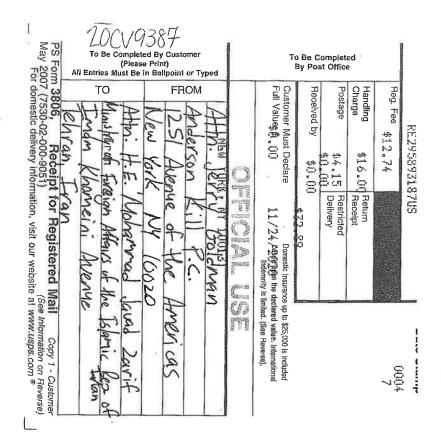
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Regards,

Enclosures

Jerry S. Goldman

EXHIBIT 1



UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK		
Jeanmarie Hargrave	•	
-V-	CERTIFICATE OF MAILING	
Islamic Republic of Iran	Case No.: <u>20cv9387</u> (GBD)(SN)	
	y that on the 24 th day of November, 2020, I y of Foreign Affairs of the Islamic Republic of Iran, Mohammad Javad Zarif	
the head of the ministry of foreign a Sovereign Immunities Act, 28 U.S.C. § 1608(a)(3).	ffairs, pursuant to the provisions of the Foreign	
l copy of the following documents • Summons • Complaint deemed filed on November 10, 2020 • Civil Cover Sheet • Statement of relatedness • Notice of suit prepared in accordance with 22 CFR & 93.2 with a copy of 28 U.S.C. && 1330, 1391(f), 1441(d) and 1602-1611 • Affidavit of translator (along with translations of the mentioned documents)		
by USPS REGISTERED MAIL RE295893187US		
	BY J. KRAJICK ERK OF COURT	
	JaVonn Ross PUTY CLERK	

EXHIBIT 2

Add a tracking number	
Showing:	All



RE295893187US

Not Trackable:

USPS Tracking[®] is unavailable for this product for IRAN ISLAMIC REPUBLIC OF.